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February 4, 2020

Honorable Joseph A. Dickson, U.S.M.J.
Martin Luther King Jr. Federal Building
& U.S. Courthouse
50 Walnut St # 4
Newark, NJ 07102

Re: Ortiz, f/n/a Moe v. Twp of Woodbridge, et al.
Civil Action No.: 2:19-cv-14139
Our File No.: 1075-1792

Dear Judge Dickson:

This firm represents the interests of the Defendants, Woodbridge Detectives Brian Jaremczak, Shayne Bodnar, Patrick Harris, Nicole Hubner, Juan Carlos Bonilla, Jr., and Patrolman Jean Rastegarpanah, in connection with the above-referenced matter. Attached please find a Discovery Confidentiality Order by Consent of the parties in this matter as well as a Certification of Counsel in support of entry of same.

The parties agree there is a need for a Discovery Confidentiality Order to protect healthcare information and investigative matters related to his case, these parties and non-parties. Counsel respectfully request that Your Honor execute and docket the Discovery Confidentiality Order upon your review.

Thank you for your kind attention to the within.

Respectfully submitted,

s/Marc D. Mory
MARC D. MORY, ESQ

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Certification of E-Filing and Service

I certify that the foregoing correspondence, Discovery Confidentiality Order and Certification of Counsel were filed with the Court and served upon all counsel of record via the Court's Electronic Case Filing System on this date.

s/ Marc D. Mory

MARC D. MORY, ESQ.

Dated: February 4, 2020